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September 21, 2020

VIA ECF

Honorable Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

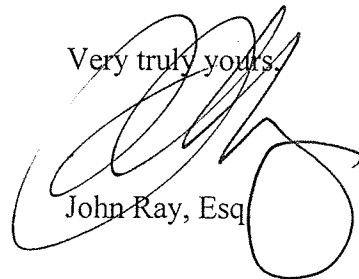
Re: Herdocia, Tatiana v. Southern Glazer's Wine & Spirits, et al.
Civ. Dkt. No. 18-cv-5284 (JMA) (ARL)
Our File No. 1663011N2418

Dear Judge Azrack,

I am Plaintiffs' attorney. I write to seek a thirty-day extension of time to October 31, 2020 to respond to Defendants' papers as to dismissal of the Motion to Dismiss Amended Complaint from August 31, 2020. I have received consent from Mr. Thorell and Mr. Mangan as to the submission of the enclosed letter to the court, but have not received consent for thirty-day extension.

I am requesting this extension due to law office failure. This is the second extension request. The first request was due to heavy motion calendar on May 29, 2020.

Very truly yours,



John Ray, Esq

JR:cs

cc: Keith Thorell, Esq. (via ECF)
J. Warren Mangan, Esq. (via ECF)
clients (via email)



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September 18, 2019

VIA ECF

The Honorable Judge Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Tatiana Herdocia, et al. v. Southern Glazer's Wine & Spirits of NY, LLC, et al.
Case No.: 18-CV-5284 JMA-ARL
Plaintiffs' Response to Pre-Motion Conference Letters

Dear Judge Azrack,

Please accept my abject apologies for missing a deadline for me to file opposition to the pending motions due to law office failure. I humbly ask for an adjournment so I can put in opposition papers. Here is what occurred since July: After I recovered from the coronavirus, my firm's office manager/bookkeeper abruptly left the firm, never to return. Shortly thereafter, my junior partner, who had been dating the manager, also left abruptly, no notice. Along with him at nearly the same time, four out of six staffers also left, no notice. They all took with them over 100 of my firm's files which went to the former junior partner for his theretofore unrevealed law firm, and erased all of their emails belonging to my firm. Only two staff remained. We were in chaos. Then one of the two staff remaining was stealing files and documents, surreptitiously giving them to my ex-partner without my knowledge. Then he abruptly left. Key documents went missing. Several ex-employees went to work for the ex-partner. In some cases, the ex-partner filed "Consent To Change Attorney" Stipulations, signing himself for the partnership as outgoing counsel without my knowledge, and signing himself as well for the incoming firm. I was able to timely catch two instances of this, but not other ones. I also discovered that, with the office manager's cooperation, the junior partner surreptitiously for at least two years' prior to his leaving, had been advertising for clients for himself, with a separate address and phone number, while my firm was paying for this advertising unbeknownst to me, amongst other financial and ethical abuses. To cover their tracks, they have launched a series of attacks upon me and my new employees, with threats to me and my new employees of lawsuits, legal reprisals, etc.

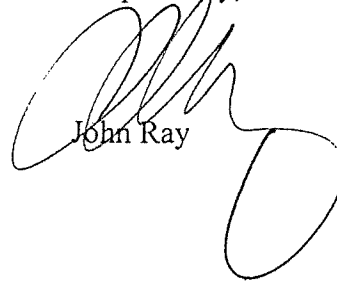
This appalling, unprecedented attack has paralyzed my practice and me for three months. I still need take on new cases to survive (I am a sole practitioner with a small practice and several large cases), answer motions, appear in court, pursue appeals, try cases, hearings, and so forth. I

have only two new, untested former students and one untested former client as employees and none have any experience in the legal field. I am soon to be the age of 72 in a month, of course you can imagine that there are even more awful circumstances engendered by these persons.

My firm and I simply did not schedule the deadline, and overlooked it, under the circumstances.

I shall put in proper papers anyway, if the court will indulge me with, say, thirty days on the motion, as I am standing back up against all of this.

Respectfully,



John Ray

JR:cs

cc: Keith R. Thorell, Esq. (via ECF)
J. Warren Mangan, Esq. (via ECF)
Clients (via email)